



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

OCT 06 2015

CERTIFIED MAIL 7009 1680 0000 7677 8794
RETURN RECEIPT REQUESTED

Mr. Chris Arriola
Plant Manager
Sims Metal Management
3100 Lonyo Street
Detroit, Michigan 48209

Re: Notice of Violation
Compliance Evaluation Inspection
MIK113238106

Dear Mr. Arriola:

On July 8, 2015, representatives of the U.S. Environmental Protection Agency and Michigan Department of Environmental Quality inspected the Sims Metal Management facility located in Detroit, Michigan (hereinafter "SMM" or "you"). As a generator of hazardous waste and used oil, SMM is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* ("RCRA"). The purpose of the inspection was to evaluate SMM's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste and used oil. A copy of the inspection report is enclosed for your reference.

Based on information provided by SMM, EPA's review of records pertaining to SMM, and the inspector's observations, EPA has determined that SMM violated the RCRA requirements related to used oil as described in paragraphs 1 - 3, below.

1. Labeling of Used Oil Containers and Tanks

Under Mich. Admin. Code R. 299.9810(5) [40 C.F.R. § 279.22(c)(1)], a generator of used oil must label or mark clearly containers and aboveground storage tanks that store used oil with the words "Used Oil."

At the time of the inspection, SMM was accumulating and storing used oil in two plastic tote containers in the maintenance shop in its West Yard. These totes were not labeled or marked clearly as "Used Oil." Similarly, a white double-walled tank on the south side of

the maintenance shop that was accumulating used oil was only labeled as "Oil" and not "Used Oil." SMM, therefore, failed to meet the above requirement.

2. Used Oil Storage Requirements

Under Mich. Admin. Code R. 299.9810(4) [40 C.F.R. § 279.22(a)], a generator of used oil shall not store used oil in units other than tanks or containers.

At the time of the inspection, SMM was managing a large pile of machine shop turnings along the eastern edge of its East Yard. Due to heavy rain in the days prior to the inspection, the residual lubricant that had been on the turnings had washed away and accumulated in a large impoundment on the ground. SMM representatives stated that this area had a concrete drainage system that was designed to carry stormwater and oil to two in-ground oil water separators. At the time of inspection, however, the drainage system was not functioning and used oil and rainwater was being stored on the ground. Because SMM was storing used oil in a unit other than a tank or container, it is in violation of the above requirement.

3. Response to Releases of Used Oil

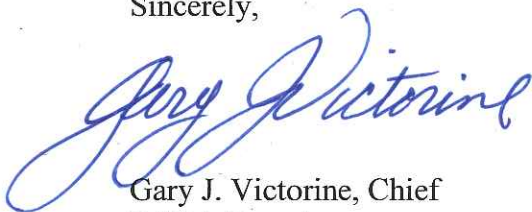
Under Mich. Admin. Code R. 299.9810(5) [40 C.F.R. § 279.22(d)], a generator of used oil shall do the following in response to a release of used oil to the environment: 1) stop the release, 2) contain the released used oil, 3) clean up and manage properly the released used oil and other materials, and 4) if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.

At the time of inspection, spills of used oil were observed in the south end of SMM's West Yard maintenance shop near a used oil drum and tank storage area. Oil-soaked absorbent material was observed on the ground in the area, but the material had not been disposed of properly. SMM, therefore, failed to properly respond to releases of used oil.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order, or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above requirements for used oil. You should submit your response to Brian Kennedy, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Kennedy, of my staff, at (312) 353-4383 or at kennedy.brian@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Sue McDonald, MDEQ (mcdonalds3@michigan.gov)
John Craig, MDEQ (craigj@michigan.gov)
Lonnie Lee, MDEQ (leel@michigan.gov)
Debbie Hays, SMM (debbie.hays@simsmm.com)



U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 5, Land and Chemicals Division
RCRA Branch, LR-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSPECTION DATE: July 8, 2015

SITE NAME: Sims Metal Management

ADDRESS: 3100 Lonyo Street
Detroit, Michigan 48209

EPA ID NUMBER: MIK113238106

GENERATOR STATUS: Non-generator (2013)

NAICS CODE: 423930 Recyclable Material Merchant Wholesaler

FACILITY CONTACT: Chris Arriola
Plant Manager

EPA INSPECTOR: Brian Kennedy
Environmental Engineer
Compliance Section 2
RCRA Branch
Land and Chemicals Division

PREPARED BY:

Brian Kennedy
Brian Kennedy

8/13/2015
Date

APPROVED BY:

Julie Morris
Julie Morris, Chief
Compliance Section 2

8/18/15
Date



Purpose of Inspection

An unannounced Compliance Evaluation Inspection (“CEI”) of Sims Metal Management (hereinafter “SMM” or “facility”) located at 3100 Lonyo Street, Detroit, Michigan took place on July 8, 2015. The CEI was conducted by U.S. Environmental Protection Agency and Michigan Department of Environmental Quality (“MDEQ”) personnel and was an evaluation of the facility’s compliance with certain provisions of the Resource Conservation and Recovery Act (“RCRA”) and its implementing regulations found in the Michigan Administrative Code and the Code of Federal Regulations. More specifically, the CEI was an evaluation of SMM’s compliance with the regulations governing generators of hazardous waste.

Participants

The following persons were present for part or all of the inspection:

Chris Arriola – Plant Manager	SMM
Sam Peters – Non-ferrous Supervisor	SMM
Tammy Myers – SHEC Coordinator (via conference call)	SMM
Sue McDonald – Environmental Specialist	MDEQ
Brian Kennedy – Environmental Engineer	U.S. EPA

Introduction

I arrived on site at 9:00 AM EST and met with Sue McDonald of the MDEQ. We entered the main office and requested to see an environmental coordinator. Mr. Chris Arriola, SMM’s Plant Manager, arrived to the main office and led us to a meeting room for an opening conference. I presented Mr. Arriola my enforcement officer credentials and business card and provided him the Small Business Resources and Pollution Prevention information sheets. I described the purpose of the U.S. EPA RCRA inspection and the process by which I would conduct the inspection, including a site tour that would include photographs of hazardous waste storage areas, as well as a review of SMM records pertaining to hazardous waste. Ms. Tammy Myers, SMM’s Safety, Health, Environmental, and Community Coordinator joined the opening conference over a conference line. Ms. Myers was not in Detroit on the day of the inspection.

I informed SMM of their right to make a confidential business information claim over the information and documents collected during the inspection.

Site Description

The following information about SMM is based on personal observations of the EPA inspector and on representations made during the inspection by facility personnel identified above or within the text unless otherwise specified.

SMM specializes in ferrous and non-ferrous scrap metal recycling. The facility takes in metal wastes from a variety of sources including materials from the consumer to the industrial scale. A large source of SMM’s metal scrap comes from Detroit-area automakers, which send over off-

specification automotive stampings and pressings. SMM also accepts large cast iron industrial equipment, consumer and commercial appliances, scrap automotive components (excluding whole vehicles), and metal turnings and fines. SMM purchased the facility at 3100 Lonyo Avenue in 2007 from the previous operator, Mars Industries. Currently, SMM has 52 employees on site and operates five days per week.

When SMM receives a scrap material, it categorizes it as ferrous or non-ferrous and places it in either the East or West scrap yards (located on opposite sides of Lonyo Street). The West Yard is used to store and process heavier, cast iron scrap while the East Yard stores more varied scrap material and is used for lighter processing. SMM utilizes both mobile shearing devices and torches to cut large scrap pieces to a manageable size. The scrap material is then baled or alternatively packaged for shipment to foundries for reuse. SMM analyzes its scrap to determine the composition of the metal and how to categorize it for end use at a foundry. This is done by applying knowledge of the scrap source or using handheld XRF devices to determine precise compositions.

SMM does not accept components that still contain fluids (e.g. automotive parts with motors oil, coolants, etc.). However, scrap parts do arrive on site which contain residual fluids, greases, and oils. This material is placed in designated piles in its East Yard where in-ground trenches carry any potential stormwater runoff to one of two separate oil-water separators. The two separators are in-ground tanks in which oil and water separate by gravity. The oil is occasionally pumped out of the tanks by Environmental Waste & Recovery Services of Merrill, Michigan and taken off site, and the remaining water is discharged to the city sewer. This area of the East Yard where the material is stored is on a concrete pad. Generally, the West Yard does not store components that contain these fluids or oils, and instead stores larger cast iron equipment. The West Yard is not equipped with in-ground oil-water separators.

SMM does not currently generate hazardous waste, although previous reporting has indicated the facility may have once generated D001 ignitable waste. Wastes currently generated at SMM include used oil, aerosol cans, and universal waste lamps. Used oil is generated from the oil-water separators in the East Yard described above, as well as various maintenance activities in the maintenance shop in the West Yard. The used oil is accumulated in the maintenance shop in totes and several small tanks. SMM's used oil is collected and taken off site by either Environmental Waste & Recovery Services or Future Environmental Services of Wayne, Michigan. Aerosol cans are also generated in the West Yard maintenance shop. When empty, the cans are collected and sent to another vendor for recycling. The cans are not punctured on site. SMM takes in automotive batteries as part of its business but does not process them. They are accumulated and sent to Quemetco, Inc. of Indianapolis, Indiana for recycling. Universal waste lamps are taken from SMM's site by Veolia Environmental Services of Port Washington, Wisconsin.

Site Tour

The site tour was led by Mr. Arriola and Mr. Sam Peters, SMM's Non-ferrous Supervisor.

The tour started at the West Yard where Mr. Arriola described the heavy processing activities that took place in the southern portion of the yard. These activities include shear and torch

cutting as well as industrial baling. There were several oxygen and propane tanks in this area to fuel the processing equipment.

Moving clockwise around the perimeter of the West Yard, Mr. Arriola described a former cast iron processing area. Here, in a large fenced-in circle, SMM would break down large cast iron scrap pieces by dropping ball weights onto their surface. The fence would prevent debris from traveling across and outside the facility. Mr. Arriola said SMM discontinued the process several years ago because it was difficult to find and keep crane operators who could do this type of work. The area used to be a deep (~20 ft) pit, but has since been filled in and is now an open area holding some scrap pieces (See Photo 1 in Attachment A: Inspection Photographs). There was no free liquid observed in the area. The fence around this area is planned to be removed.

There were several large piles of soil around the West Yard. Mr. Arriola said the yard is periodically re-graded and re-graveled to allow easier movement of heavy equipment. Soil from re-grading is kept in these piles before being sent to a landfill. The soil is screened for scrap metal and magnetics before shipment off site.

The tour continued to a maintenance shop on the east side of the West Yard. Here, SMM conducts repairs on its equipment and refuels its trucks. A diesel storage tank was outside the entrance to the shop. Inside the maintenance shop were two plastic totes storing used oil. The totes were not labeled as "Used Oil" (See Photos 2 and 3). A parts washer was observed in the shop but it did not appear to be in use. A nearby drum labeled as mineral spirits and used oil also appeared empty. Aerosol cans are sent to a scrap recycler, but no designated container accumulating these cans was observed in the maintenance shop. Only a few aerosol cans were seen around the entire shop. On the south end of the shop was a larger used oil storage area. Here, SMM maintained two double-walled tanks and several drums in containment in an enclosed area. (See Photos 4 and 5). The white used oil tank was only labeled "Oil." There appeared to be some free oil in the containment system over which the drums of used oil were stored. Oil stains and soaked absorbent were observed on the ground in this area.

Mr. Arriola led the tour across Lonyo Avenue to the East Yard. Here, SMM process a wider variety of smaller scrap and non-ferrous materials. Mr. Arriola and Mr. Peters briefly described the operations in the yard and pointed out designated piles of automotive stamping scrap, appliances, motors, metal fines, and other materials. I asked Mr. Peters about a pile of scrap refrigerators and air conditioning units. He said SMM has a certified Freon and CFC removal equipment to extract these chemicals from the appliances before they are processed. I also asked if SMM takes in electronic waste like computers or televisions. He said they did not, and incoming waste is screened to avoid electronic wastes from entering the site.

There were very large piles of soil intermixed with scrap metal along the perimeter of the East Yard. Mr. Arriola said this soil is also generated from re-grading of the area, and that the soil will be screened before it is sent to a landfill. Rain in the days before the inspection had accumulated in certain areas of the yard (See Photo 6). These puddles did not have a sheen. There was dark staining on the ground in some areas, but it was unclear what had caused the staining.

Along the eastern edge of the yard SMM maintained several piles of metal fines. One pile contained machine shop turnings which had arrived to SMM with lubricant and coolant residues. Rainwater appeared to have washed away much of this residue and had accumulated in a large puddle next to the pile (See Photos 7 and 8). I asked Mr. Arriola what would be done with this material. He said the liquid should be draining into a trench system behind the metal fines, which would take it to one of two in-ground oil-water separators. The accumulation of soil in the area had apparently blocked effective draining of liquid away from the scrap. Mr. Arriola said the scrap piles in this area are all on top of a concrete pad, and the trench system to drain runoff from these piles is also concrete. No concrete pad was visible during the inspection, likely because so much dirt had accumulated over the system. I asked Mr. Arriola to point out the trenches that would normally drain away runoff. He said runoff is split in direction based on a nearby guard shack. For piles south of the guard shack, liquid should drain south into a 5,000 gallon oil-water separator tank. Looking north to the guard shack from behind the pile of metal fines, a trench system was not visible (See Photo 9).

Moving to the southern oil-water separator, some liquid appeared to be draining into the system but not from the path of the in-ground trench (See Photos 10 and 11). The tour moved north past the guard shack to see drainage in the north direction. Most of the drainage trench was not visible behind the piles of scrap, but a portion of the trench did become visible when it connected to a pipe that carries liquid to the oil-water separator (See Photos 12 and 13). Some of the lubricant and coolant was draining into this portion of the trench. The oil-water separator that collects north-flowing liquids has a capacity of 12,000 gallons.

After viewing the oil-water separator, the tour continued into SMM's Freon extraction room, which is part of a larger warehouse area attached to SMM's main office. Mr. Peters explained the extraction processor and stated that drained appliances are marked to indicate they are safe for processing. There were several small pressurized tanks in the area holding extracted chemicals. Outside the north side of this building, SMM accepts scrap materials from smaller suppliers and the public. SMM screens incoming waste in this area. There was a large pile of old cathode-ray tube television sets near other piles of old appliances. Some of the tubes inside the televisions were visibly broken. I asked Mr. Arriola and Mr. Peters how this waste gets on site when SMM does not process electronic waste. They said the screening process is in place but does not always work, and some people will dump hidden waste once they get on site.

Back inside the warehouse attached to the main office, Mr. Arriola and Mr. Peters described the staging for metal scrap ready for shipment. There was no waste observed in this area. Mr. Arriola led us back inside the office to review records.

Record Review

I requested the following SMM documents for review:

- A site plan of the East Yard drainage system
- Non-hazardous waste manifests for used oil, universal waste, and the oil removed from the East Yard catch basins

Sims Metal Management
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July 8, 2015

Mr. Arriola was able to provide a map of the facility from 2003 which displayed the layout of the concrete pads in the East Yard. The map marked the concrete trenches along the east side of the yard which drain to the two oil-water separators. Both oil-water separators have storm pipelines that lead to connections on Lonyo Avenue to the city sewer. This map is in Attachment B.

Mr. Arriola said he would be able to provide the other documents but that it may take some coordination with Tammy Myers. I said he could provide them over email or send hardcopies.

Closing Conference

I summarized my review of the site and potential issues to Mr. Arriola and Mr. Peters. Potential issues included:

- The management of containers storing used oil and labeling those containers as "Used Oil"
- The management of lubricant/coolant in the East Yard and how the drainage system does not appear to be fully functioning

I showed Mr. Arriola and Mr. Peters the photographs I took during the site tour. They did not make a confidential business information claim.

The inspection ended at approximately 12:00 PM.

Inspection Follow-Up

On July 9, 2015, Ms. Deborah Hays, SMM's SHEC Director for the Central Region, sent an email to clarify the information that been requested during the inspection. I replied to Ms. Hays on July 14 stating I had requested non-hazardous waste manifests related to used oil, universal waste, and oil-water separator waste.

On July 17, Ms. Hays provided hardcopies of the requested documents. Included was an invoice and several manifests dated 1/5/2012 for the vacuum removal of waste from the oil-water separator "run off tanks" in the East Yard by Environmental Waste & Recovery Services. Several bills of lading were included that displayed the shipment of lead and steel-cased batteries to Quemetco as scrap. The bills of lading dated from July 2014 to May 2015. Two shipment documents from August 2014 and January 2015 displayed the shipment of non-hazardous used oil to Future Environmental. The final document was a certificate of recycling for fluorescent and u-tube lamps to Veolia Environmental Services dated 9/23/2013. These documents are provided in Attachment C.

Attachments

- A. Inspection Photographs
- B. East Yard Map
- C. Inspection Follow-Up Documents
- D. Inspection Checklist



ATTACHMENT A: Inspection Photographs

Photographs were taken by Brian Kennedy using a Canon PowerShot A2400 IS Digital Camera.

RCRA Photo Log

Photo	Description	Date	Time (CST)
1	The former cast iron processing pit in the West Yard. The protective fencing is planned to be removed.	7/8/2015	9:18 AM
2	An unlabeled tote of used oil in the West Yard maintenance shop.	7/8/2015	9:31 AM
3	A second unlabeled tote of used oil in the West Yard maintenance shop.	7/8/2015	9:32 AM
4	A storage area over containment in the West Yard maintenance shop that held several drums of used oil.	7/8/2015	9:41 AM
5	Two used oil storage tanks in the West Yard maintenance shop. The white tank was only labeled "oil".	7/8/2015	9:41 AM
6	Piles of soil and scrap and accumulated rainwater in the East Yard.	7/8/2015	9:54 AM
7	A large puddle of lubricant and coolant from a staged pile of scrap metal turnings in the East Yard.	7/8/2015	10:03 AM
8	Another view of the puddle in Photo 7.	7/8/2015	10:03 AM
9	A view of where the south concrete drainage trench would be to carry runoff to an oil-water separator. The trench was not visible.	7/8/2015	10:06 AM
10	The opening above the south oil-water separator in the East Yard.	7/8/2015	10:09 AM
11	Lubricant and coolant draining towards the oil-water separator in Photo 10.	7/8/2015	10:09 AM
12	Lubricant and coolant draining into the north trench which drains to the north oil-water separator in the East Yard.	7/8/2015	10:15 AM
13	The north drainage trench in Photo 12 drains to an underground pipe to carry liquid into the oil-water separator.	7/8/2015	10:18 AM

Sims Metal Management
MIK113238106
July 8, 2015

Photo 1:



Sims Metal Management
MIK113238106
July 8, 2015

Photo 2:



Sims Metal Management
MIK113238106
July 8, 2015

Photo 3:



Sims Metal Management
MIK113238106
July 8, 2015

Photo 4:



Sims Metal Management
MIK113238106
July 8, 2015

Photo 5:



Sims Metal Management
MIK113238106
July 8, 2015

Photo 6:



Sims Metal Management
MIK113238106
July 8, 2015

Photo 7:



Sims Metal Management
MIK113238106
July 8, 2015

Photo 8:



Sims Metal Management
MIK113238106
July 8, 2015

Photo 9:



Sims Metal Management
MIK113238106
July 8, 2015

Photo 10:



Sims Metal Management
MIK113238106
July 8, 2015

Photo 11:



Sims Metal Management
MIK113238106
July 8, 2015

Photo 12:



Sims Metal Management
MIK113238106
July 8, 2015

Photo 13:

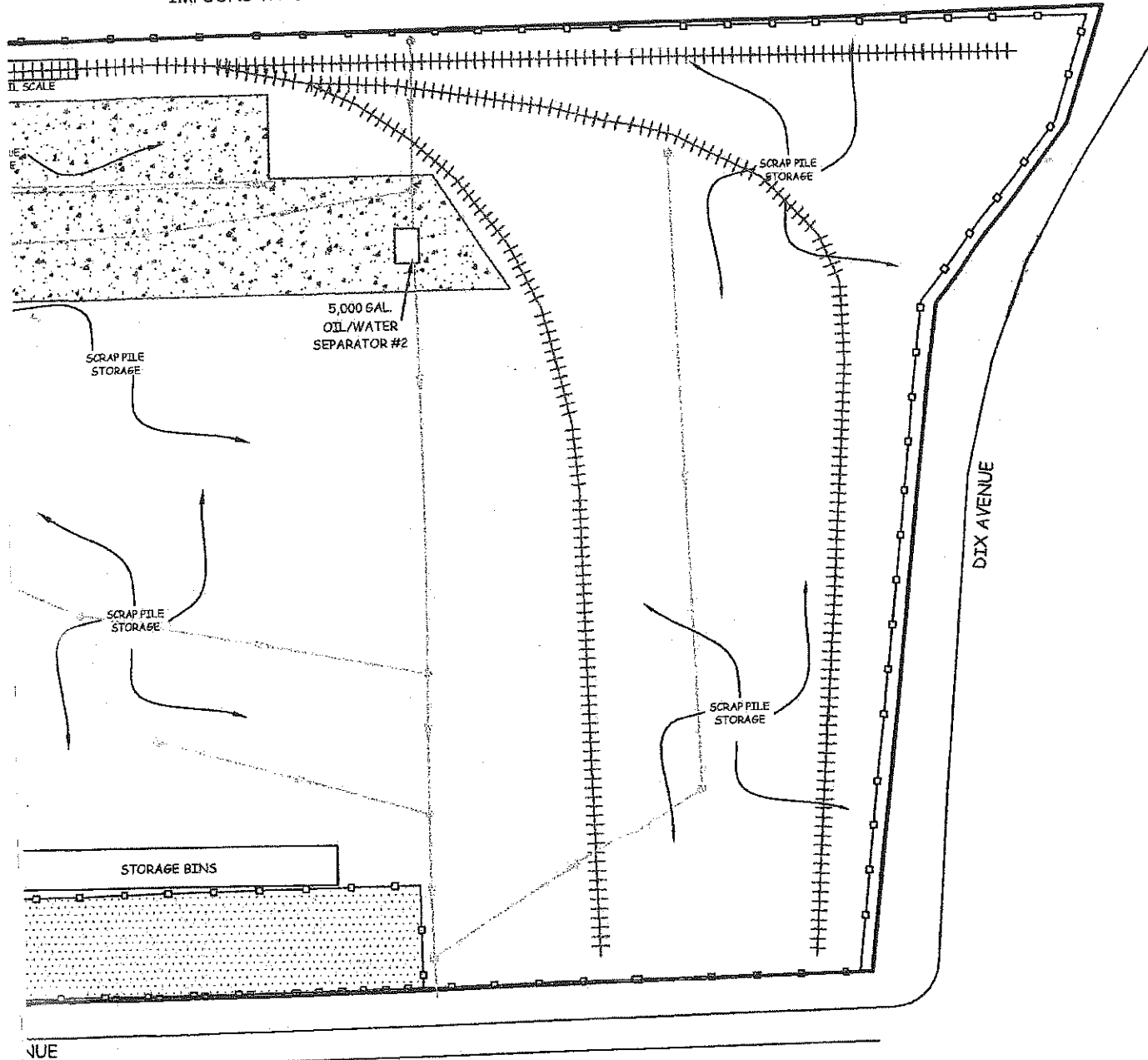


Sims Metal Management
MIK113238106
July 8, 2015

ATTACHMENT B: East Yard Map



CITY OF DETROIT
IMPOUND YARD



MARS INDUSTRIES, INC.
3100 LONYO AVENUE
DETROIT, MICHIGAN 48209

ECT

Environmental Consulting & Technology, Inc.
2250 Genoa Business Park Drive
Suite 130
Brighton, Michigan 48114
Phone: (810) 494-5051 Fax: (810) 494-5059

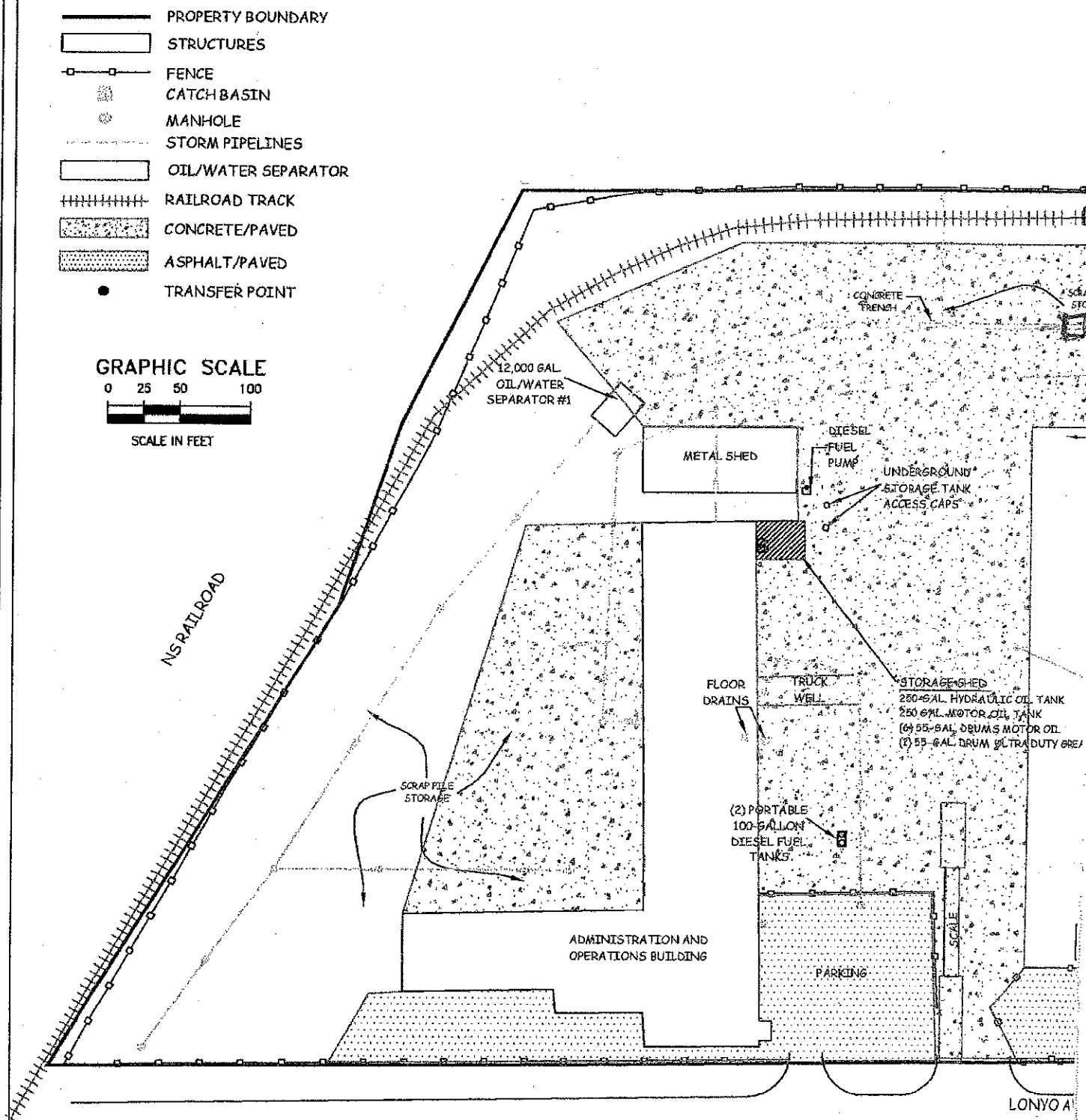


FIGURE 2.
FACILITY LAYOUT – MAIN YARD

Sims Metal Management
MIK113238106
July 8, 2015

ATTACHMENT C: Follow-Up Documents



2500 S. Paulina Street
Chicago, IL 60608

Telephone 773-650-6495
Facsimile: 630-929-8543
debbie.hays@simsmm.com
www.simsmm.com

July 17, 2015

U.S. EPA Region 5
77 W. Jackson Blvd, LR-8J
Chicago, IL 60604

State of Michigan
Dept. of Environmental Quality
27700 Donald Court
Warren, MI 48092-2793

Attn: Brian Kennedy

Susan McDonald

Re: Metal Dynamics Detroit
3100 Lonyo Avenue
Detroit, MI 48209

Dear Brian and Susan,

Enclosed are the documents requested during your inspection of our Detroit facility on July 8, 2015 and verified via email on July 14, 2015.

Also stated in our email correspondence on July 14, 2015, a hard copy of the inspection report will be mailed to the Detroit facility to the attention of Tammy Myers and Chris Arriola, with an electronic version forwarded to me. I really appreciate the offer of an electronic version sent to me.

If you have any additional questions or concerns, please feel free to send an email or give me a call.

Sincerely,

Metal Management Midwest, Inc.
d/b/a Sims Metal Management

A handwritten signature in blue ink, appearing to read "Deborah Hays".

Deborah Hays
SHEC Director, Central Region

pc: Lew Ross, General Manager, Central Region
Tammy Myers, SHEC Manager



Environmental Waste & Recovery Service

246 N. Eddy St.
Merrill, MI 48637

Phone (989)643-0700 Fax (989)643-0900

Invoice

Date	Invoice #
1/5/2012	WO1191

Bill To

SIMS METAL MANAGEMENT
3100 LONYO
DETROIT, MI 48209

Job Site

3100 LONYO
DETROIT

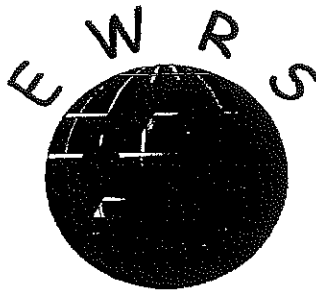
DT009522

		Manifest 1	Manifest 2	Terms
		004556426 FLE	004556426 FLE	Due on receipt
Quantity	Description		Rate	Amount
10.5	VAC TRUCK W/OPERATOR (3500)		115.00	1,207.50
10.5	TANKER TRANSPORT		115.00	1,207.50
10.5	TANKER TRANSPORT		115.00	1,207.50
10.171	LIQUID WASTE DISPOSAL		0.30	3,051.30
VAC LIQUIDS FROM RUN OFF TANKS				
		<i>Environmental A# 3482</i>		

EWRS

1883 East Garfield Road
Ashley, MI 48806

Tim O'Leary: 616-520-1352
Main Office: 989-643-0700
Toll Free: 800-496-3885
Fax: 989-643-0900



WORK ORDER #

1551

ENVIRONMENTAL WASTE
& RECOVERY SERVICE INC.

Date: 1-5-12

Manifest #: 004556426 FLE
004556273 FLE

P.O. #:

EWRS Driver: Jeff Andy
Truck #: MBH 26-27

Customer's Name: Sims Metal Management

Address: 3100 Lonyo

City: Detroit

State: MI

Zip: 48209

Service Location:

Contact Name: Chris

Contact Phone #: 313-790-8116

Jetting: Line Size:

Linear Ft:

Vac / Pump:

Gallons: 10,171

Yards:

Waste Type: oily water/silage

Time Arrived:	10:30	am / pm
Time Departed:	4:30	am / pm
Travel Time:	2.25	Down/Dump Time:
Explain:		
Televising: Line Size:	Linear Ft:	

Work Description:

Vac liquids from run off tanks
3-TRUCKS 10.5 HRS @ 115 HR = 3622.50
DISPOSAL 10,171 GAL @ .30 CPG = 3051.30

1. Customer acknowledges completion of activity described on this work order. Customer must pay fees and expenses charged by EWRS for the services, including any cost of collection.
2. Customer's Statements (a) All of Customer's oral and written descriptions of the waste provided to EWRS are accurate. (b) Customer has chosen the facility to which the materials are to be transported. (c) The waste has been properly prepared for transport, recycling, or disposal. (d) Customer has authority to contract for transport, recycling, and disposal of the waste.
3. Customer must pay all costs incurred by EWRS resulting from any inaccuracy in the Customer's Statements. Customer must indemnify EWRS for any damage to property or equipment incurred while equipment is under Customer's control, and for any claim arising from EWRS services for Customer which are not due to EWRS gross negligence.

Work Order Authorization: I acknowledge completion of the described work which has been done to my (the customers) satisfaction.

Print Name: Jennifer Haner

Signature: [Signature]

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MI6000937737		2. Page 1 of 1		3. Emergency Response Phone 616-520-1352		4. Manifest Tracking Number 004556273 FLE		
		5. Generator's Name and Mailing Address S.M. Metal Management 3100 Conyo St Detroit MI 48209								
Generator's Phone: 48209		Generator's Site Address (if different than mailing address)						U.S. EPA ID Number MIK231485913		
6. Transporter 1 Company Name E WRS		7. Transporter 2 Company Name						U.S. EPA ID Number		
8. Designated Facility Name and Site Address E WRS 1883 E Garfield Ashley MI 48806		U.S. EPA ID Number MIK231485913						Facility's Phone: 48806		
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
						No.	Type			
	1.	Other waste				001	TT	9937	6	029
	2.									
	3.									
4.										
14. Special Handling Instructions and Additional Information 961-only water										
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.										
Generator's/Officer's Printed/Typed Name Jennifer Hanner										
Signature J. Hanner										
Month Day Year 11 5 12										
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____									
	Transporter signature (for exports only): _____									
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials									
	Transporter 1 Printed/Typed Name Jeff Buckley					Signature Jeff Buckley				
Transporter 2 Printed/Typed Name					Signature					Month Day Year
DESIGNATED FACILITY	18. Discrepancy									
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
	Manifest Reference Number: _____									
	18b. Alternate Facility (or Generator)									
	U.S. EPA ID Number									
Facility's Phone: _____										
18c. Signature of Alternate Facility (or Generator)										
Month Day Year										
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)										
1.			2.			3.			4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a										
Printed/Typed Name J. Buckley					Signature J. Buckley					Month Day Year 11 11 12

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MI 16 000037737	2. Page 1 of 1	3. Emergency Response Phone 616-520-1352	4. Manifest Tracking Number 004556426 FLE	
5. Generator's Name and Mailing Address Suns Metal Management 3100 Conyn St		Generator's Site Address (If different than mailing address)				
Generator's Phone: Detroit MI 48209		U.S. EPA ID Number MIK231485913				
6. Transporter 1 Company Name EWRS		U.S. EPA ID Number				
7. Transporter 2 Company Name		U.S. EPA ID Number				
8. Designated Facility Name and Site Address EWRS 1823 E Garfield Ashley MI 48806		U.S. EPA ID Number MIK231485913				
Facility's Phone:						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt/Vol	13. Waste Codes
1.	Other waste	001	TI	734	6	0294
2.						
3.						
4.						
14. Special Handling Instructions and Additional Information 961 - only water / sludge						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name Jennifer Haner		Signature J. Haner		Month Day Year 11 5 12		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name Andy Olney		Signature Andy Olney		Month Day Year 11 5 12		
Transporter 2 Printed/Typed Name		Signature		Month Day Year		
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
Manifest Reference Number: _____						
18b. Alternate Facility (or Generator) U.S. EPA ID Number						
Facility's Phone: _____						
18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1.	2.	3.	4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name H. B. B. B.		Signature H. B. B. B.		Month Day Year 11 11 12		

METAL DYNAMICS DETROIT, LLC.
STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - Not Negotiable

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to such carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SIMSM - DETROIT NONFERROUS

SHIPMENT #

TDDWQU

CARRIER'S NO.

Ticket # TDDWQU

At **DETROIT, MI** Date **07/02/14** From **SIMSM - DETROIT NONFERROUS**
3100 LONYO AVENUE
DETROIT, MI 48209

Consigned To **RSR CORPORATION**
QUEMETCO, INC.
7870 W. MORRIS STREET
Destination **INDIANAPOLIS, IN 46241**

Route **Delivery Address**
(To be filled in only when shipper desires and government tariffs provide for delivery thereat.)

Delivering Carrier

Car Initials **TK** Car No. **1313**

Number Packages	* HM	KIND OF PACKAGE, DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS	* WEIGHT (Subject to Correction)	Class Of Rate	Ch. Col.	
		WHOLE BATTERIES	GROSS 41136			Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
		STEEL CASED BATTERIES	TARE 1083			
		LEAD	NET 40053			
			ADJ 0			
			SHIP 40053			
		OUR ORDER # 21172-00 MAT'L REQ # 21172-00				(Signature of consignor.) If charges are to be prepaid write or stamp here "To be prepaid".
		CUST PO # 4500237145				
		SEAL # 10408				
						Rec'd \$ to apply in prepayment of the charges on the property described herein.
						Agent or Cashier
						Per (The signature here acknowledges only the amount prepaid.)
						Charges advanced:
						\$

FOR THIS DELIVERY PLEASE REFERENCE SHIPMENT# TDDWQU

****ALL SCRAP MATERIAL HAS BEEN SCANNED FOR RADIOACTIVE MATERIALS****

(Commodities being transported for Remelting Purposes ONLY.
All applicable tariffs pertaining to recycling materials apply.)

PROTECT LOWEST THRU-RATE -- LOADED TO FULL VISIBLE CAPACITY

* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
† The fibre boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Consolidated Freight Classification.
‡ Shipper's imprint in lieu of stamp, not a part of bill of lading approved by the Interstate Commerce Commission.
NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding per

Shipper **DETROIT, MI 48209** Agent **Per LEW ROSS**
Permanent post-office address of shipper. * MARK WITH "X" TO DESIGNATE HAZARDOUS MATERIAL AS DEFINED IN TITLE 49 OF FEDERAL REGULATIONS.

METAL DYNAMICS DETROIT, LLC.

STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - Not Negotiable

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SIMSMM - DETROIT NONFERROUS

SHIPMENT #

TDEBTH

CARRIER'S NO.

Ticket # TDEBTH

At DETROIT, MI Date 08/04/14 From SIMSMM - DETROIT NONFERROUS
3100 LONYO AVENUE
DETROIT, MI 48209

Consigned To RSR CORPORATION
QUENETCO, INC.
7870 W. MORRIS STREET
Destination INDIANAPOLIS, IN 46241

Route

Delivery Address

(To be filled in only when shipper desires and government tariffs provide for delivery thereat.)

Delivering Carrier

Car Initials TK

Car No. 33

Number Packages	* HM	KIND OF PACKAGE, DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS	* WEIGHT (Subject to Correction)	Class Of Rate	Ch. Col.
		WHOLE BATTERIES LEAD	GROSS 39975 TARE 717 NET 39258 ADJ 0 SHIP 39258		
OUR ORDER # 21573-00 MAT'L REQ # 21573-00 CUST PO # 4500247196					
<p>Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:</p> <p>The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.</p> <p>(Signature of consignor)</p> <p>If charges are to be prepaid write or stamp here "To be prepaid".</p> <p>Rec'd \$</p> <p>to apply in prepayment of the charges on the property described hereon</p> <p>Agent or Cashier</p> <p>Per</p> <p>(The signature here acknowledges only the amount prepaid)</p> <p>Charges advanced</p> <p>\$</p>					
<p>FOR THIS DELIVERY PLEASE REFERENCE SHIPMENT# TDEBTH</p>					
<p>**ALL SCRAP MATERIAL HAS BEEN SCANNED FOR RADIOACTIVE MATERIALS**</p> <p>(Commodities being transported for Remelting Purposes ONLY. All applicable tariffs pertaining to recycling materials apply.)</p> <p>PROTECT LOWEST THRU-RATE — LOADED TO FULL VISIBLE CAPACITY</p>					
<p>* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight. † The fibre boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Consolidated Freight Classification. ‡ Shipper's imprint in lieu of stamp, not a part of bill of lading approved by the Interstate Commerce Commission. NOTE: Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding per</p>					

DETROIT, MI 48209

Shipper

Per

Agent

Per

LEW ROSS

Permanent post-office address of shipper

* MARK WITH "X" TO DESIGNATE HAZARDOUS MATERIAL AS DEFINED IN TITLE 49 OF FEDERAL REGULATIONS.

METAL DYNAMICS DETROIT, LLC.
STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - Not Negotiable

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SIMSM - DETROIT NONFERROUS

SHIPMENT #

TDEKGI

CARRIER'S NO.

Ticket # TDEKGI

At DETROIT, MI Date 09/24/14 From SIMSM - DETROIT NONFERROUS
3100 LONYO AVENUE
Consigned To RSR CORPORATION
QUOMETCO, INC.
Destination 7870 W. MORRIS STREET
INDIANAPOLIS, IN 46241
DETROIT, MI 48209

Route

Delivery Address

(To be filled in only when shipper desires and government tariffs provide for delivery thereof.)

Delivering Carrier

Car Initials

TK

Car No. 781

Number Packages	* HM	KIND OF PACKAGE, DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS	* MARKS (Subject to Correction)	Class Of Rate	Ch. Col.
		WHOLE BATTERIES	GROSS 42647		
		STEEL CASED BATTERIES	TARE 1297		
		SCRAP LEAD	NET 41350		
			ADJ 0		
			SHIP 41350		

OUR ORDER # 22248-00 MAT'L REQ # 22248-00
CUST PO # 4500252072

Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor)

If charges are to be prepaid write or stamp here "To be prepaid".

Rec'd \$

to apply in prepayment of the charges on the property described hereon

Agent or Cashier

Per

(The signature here acknowledges only the amount prepaid)

Charges advanced

\$

FOR THIS DELIVERY PLEASE REFERENCE SHIPMENT# TDEKGI

****ALL SCRAP MATERIAL HAS BEEN SCANNED FOR RADIOACTIVE MATERIALS****

(Commodities being transported for Remelting Purposes ONLY.
All applicable tariffs pertaining to recycling materials apply.)

PROTECT LOWEST THRU-RATE --- LOADED TO FULL VISIBLE CAPACITY

* If the shipment moves between two ports by a carrier by water, the law requires that this bill of lading shall state whether it is carrier's or shipper's weight.
† The fibre boxes used for the shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Consolidated Freight Classification.
‡ Shipper's imprint in lieu of stamp, not a part of bill of lading approved by the Interstate Commerce Commission.
NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per

Shipper

Agent

DETROIT, MI 48209

Per

Per LEW ROSS

Permanent post-office address of shipper.

* MARK WITH "X" TO DESIGNATE HAZARDOUS MATERIAL AS DEFINED IN TITLE 49 OF FEDERAL REGULATIONS.

METAL DYNAMICS DETROIT, LLC.

STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - Not Negotiable

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading.

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SIMSMM - DETROIT NONFERROUS

SHIPMENT #

034029

CARRIER'S NO.

Ticket # TDENSU

At DETROIT, MI Date 10/16/14 From SIMSMM - DETROIT NONFERROUS
3100 LONYO AVENUE
DETROIT, MI 48209

Consigned To RSR CORPORATION

Destination 2777 STEMMONS FREEWAY
SUITE 1800
DALLAS, TX 75207

Route

Delivery Address

(To be filled in only when shipper desires and government tariffs provide for delivery thereat.)

Delivering Carrier

Car Initials

TK

Car No.

HD301

Number Packages	HM	KIND OF PACKAGE, DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS	* WEIGHT (Subject to Correction)	Class Of Rate	Ck. Col.
		BATTERIES	GROSS 43694		
			TARE 1114		
			NET 42580		
			ADJ 0		
			SHIP 42580		
SHIPMENT # 034029					
OUR ORDER # 22780-01 MAT'L REQ # 22780-50-01					
CUST PO # 4500253413					
SEAL # 12218					
<p>Subject to Section 7 of conditions of applicable bill of lading, if the shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:</p> <p>The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.</p>					
<p>(Signature of consignor)</p> <p>If charges are to be prepaid write or stamp here: "To be prepaid".</p>					
<p>Rec'd \$</p> <p>To apply in prepayment of the charges on the property described hereon.</p>					
<p>Agent or Cashier</p>					
<p>Per</p> <p>(The signature here acknowledges only the amount prepaid.)</p> <p>Charges advanced.</p>					
<p>\$</p>					

FOR THIS DELIVERY PLEASE REFERENCE SHIPMENT# 034029

****ALL SCRAP MATERIAL HAS BEEN SCANNED FOR RADIOACTIVE MATERIALS****

(Commodities being transported for Remelting Purposes ONLY.
All applicable tariffs pertaining to recycling materials apply.)

PROTECT LOWEST THRU-RATE — LOADED TO FULL VISIBLE CAPACITY

* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
† The three boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Consolidated Freight Classification.
‡ Shipper's imprint in lieu of stamp, not a part of bill of lading approved by the Interstate Commerce Commission.
NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

Shipper

Agent

DETROIT, MI 48209

Per

Per

LEW ROSS

Permanent post-office address of shipper

* MARK WITH "X" TO DESIGNATE HAZARDOUS MATERIAL AS DEFINED IN TITLE 49 OF FEDERAL REGULATIONS.

METAL DYNAMICS DETROIT, LLC.

STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - Not Negotiable

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading.

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, it on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SIMSMM - DETROIT NONFERROUS

SHIPMENT #

TDERLF

CARRIER'S NO.

Ticket # TDERLF

At DETROIT, MI Date 11/12/14 From SIMSMM - DETROIT NONFERROUS
3100 LONYO AVENUE
Consigned To RSR CORPORATION
QUEMETCO, INC.
Destination 7870 W. MORRIS STREET
INDIANAPOLIS, IN 46241

Route Delivery Address
(To be filled in only when shipper desires and government tariffs provide for delivery thereat.)

Delivering Carrier		Car Initials	TK	Car No.	TDERLF
Number Packages	* HM	KIND OF PACKAGE, DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS		* WEIGHT (Subject to Correction)	Class Of Rate
				GROSS	44833
				TARE	1027
				NET	43806
				ADJ	0
				SHIP	43806
		OUR ORDER # 23293-00 MAT'L REQ # 23293-50-00			
		CUST PO # 4500255896			
		SEAL # 11294			
				Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.	
				(Signature of consignor.) If charges are to be prepaid write or stamp here: "To be prepaid".	
				Rec'd \$ to apply in prepayment of the charges on the property described herein	
				Agent or Cashier	
				Per (The signature here acknowledges only the amount prepaid.) Charges advanced:	
				\$	
<div style="border: 1px solid black; padding: 5px; text-align: center;"> FOR THIS DELIVERY PLEASE REFERENCE SHIPMENT# TDERLF </div>					
ALL SCRAP MATERIAL HAS BEEN SCANNED FOR RADIOACTIVE MATERIALS (Commodities being transported for Remelting Purposes ONLY. All applicable tariffs pertaining to recycling materials apply.)					
PROTECT LOWEST THRU-RATE — LOADED TO FULL VISIBLE CAPACITY					
<small>* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight. † The fibre boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Consolidated Freight Classification. ‡ Shipper's inland in lieu of stamp, not a part of bill of lading approved by the Interstate Commerce Commission. NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____</small>					

DETROIT, MI 48209

Shipper

Per

Agent

Per

LEW ROSS

Permanent post-office address of shipper

* MARK WITH "X" TO DESIGNATE HAZARDOUS MATERIAL AS DEFINED IN TITLE 49 OF FEDERAL REGULATIONS.

METAL DYNAMICS DETROIT, LLC.
STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - Not Negotiable

RECEIVED subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading.
the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SIMSMM - DETROIT NONFERROUS

SHIPMENT #

TDEUZY

CARRIER'S NO.

Ticket # TDEUZY

At DETROIT, MI Date 12/12/14 From SIMSMM - DETROIT NONFERROUS
3100 LONYO AVENUE
DETROIT, MI 48209

Consigned To RSR CORPORATION

Destination 2777 STEMMONS FREEWAY
SUITE 1800
DALLAS, TX 75207

Route

Delivery Address

(To be filled in only when shipper desires and government tariffs provide for delivery thereat.)

Delivering Carrier

Car Initials TK

Car No. RSR

Number Packages	* HM	KIND OF PACKAGE, DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS	* WEIGHT (Subject to Correction)	Class. Of Rate	CK. Col.
		WHOLE BATTERIES	GROSS 42712		
		STEEL CASED BATTERIES	TARE 1089		
			NET 41623		
			ADJ 0		
			SHIP 41623		

OUR ORDER # 23684-00 MAT'L REQ # 23684-5D-00

CUST PO # 4500256996

SEAL # 11288

SEAL 2 # 11288

Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor)

If charges are to be prepaid write or stamp here: "To be prepaid"

Rec'd \$

to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per

(The signature here acknowledges only the amount prepaid.)
Charges advanced

FOR THIS DELIVERY PLEASE REFERENCE SHIPMENT# TDEUZY

****ALL SCRAP MATERIAL HAS BEEN SCANNED FOR RADIOACTIVE MATERIALS****

(Commodities being transported for Remelting Purposes ONLY.
All applicable tariffs pertaining to recycling materials apply.)

PROTECT LOWEST THRU-RATE — LOADED TO FULL VISIBLE CAPACITY

* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
† The flure boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Consolidated Freight Classification.
‡ Shipper's imprint in lieu of stamp, not a part of bill of lading approved by the Interstate Commerce Commission.
NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

DETROIT, MI 48209

Shipper
Per

Agent
Per

LEW ROSS

Permanent post-office address of shipper.

* MARK WITH "X" TO DESIGNATE HAZARDOUS MATERIAL AS DEFINED IN TITLE 49 OF FEDERAL REGULATIONS.

METAL DYNAMICS DETROIT, LLC.
STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - Not Negotiable

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SIMSMM - DETROIT NONFERROUS

SHIPMENT #

TDEZKO

CARRIER'S NO.

Ticket # TDEZKO

At DETROIT, MI Date 01/23/15 From SIMSMM - DETROIT NONFERROUS
3100 LONYO AVENUE
DETROIT, MI 48209

Consigned To RSR CORPORATION

Destination 2777 STEMMONS FREEWAY
SUITE 1800
DALLAS, TX 75207

Route Delivery Address
(To be filled in only when shipper desires and government tariffs provide for delivery thereat.)

Delivering Carrier		Car Initials	TK	Car No.	568
Number Packages	* HM	KIND OF PACKAGE, DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS		* WEIGHT (Subject to Correction)	Class Of Rate
		STEEL CASED BATTERIES		GROSS 42491	Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
		WHOLE BATTERIES		TARE 1017	
				NET 41474	
				ADJ 0	
				SHIP 41474	
OUR ORDER # 23684-00		MAT'L REQ # 23684-5D-00			
CUST PO # 4500256996					
SEAL # 10404					
<div style="border: 1px solid black; padding: 5px; text-align: center;">FOR THIS DELIVERY PLEASE REFERENCE SHIPMENT# TDEZKO</div>					
ALL SCRAP MATERIAL HAS BEEN SCANNED FOR RADIOACTIVE MATERIALS					
(Commodities being transported for Remelting Purposes ONLY. All applicable tariffs pertaining to recycling materials apply.)					
PROTECT LOWEST THRU-RATE — LOADED TO FULL VISIBLE CAPACITY					
<small>* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight. † The fibre boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Consolidated Freight Classification. ‡ Shipper's imprint in lieu of stamp, not a part of bill of lading approved by the Interstate Commerce Commission. NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding per</small>					

Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor)

If charges are to be prepaid write or stamp here: "To be prepaid".

Rec'd \$

to apply in prepayment of the charges on the property described herein

Agent or Cashier

Per

(The signature here acknowledges only the amount prepaid.)

Charges advanced

\$

DETROIT, MI 48209

Shipper

Per

Agent

Per

LEW ROSS

Permanent post-office address of shipper

* MARK WITH 'X' TO DESIGNATE HAZARDOUS MATERIAL AS DEFINED IN TITLE 49 OF FEDERAL REGULATIONS.

METAL DYNAMICS DETROIT, LLC.
STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - Not Negotiable

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SIMSMM - DETROIT NONFERROUS

SHIPMENT #

TDFEYB

CARRIER'S NO.

Ticket # TDFEYB

At DETROIT, MI Date 03/24/15 From SIMSMM - DETROIT NONFERROUS
3100 LONYO AVENUE
DETROIT, MI 48209

Consigned To RSR CORPORATION

Destination 2777 STEMMONS FREEWAY
SUITE 1800
DALLAS, TX 75207

Route

Delivery Address

(To be filled in only when shipper desires and government tariffs provide for delivery thereat.)

Delivering

Carrier

Car Initials

TK

Car No.

TDFEYB

Number Packages	* HM	KIND OF PACKAGE, DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS	* WEIGHT (Subject to Correction)	Class Of Rate	Ch. Col.
		WHOLE BATTERIES	GROSS 39838		
		STEEL CASED BATTERIES	TARE 1032		
		LEAD SCRAP	NET 38806		
			ADJ 0		
			SHIP 38806		

OUR ORDER # 24955-00 MAT'L REQ # 24955-5D-00

CUST PO # 4500263800

SEAL # 107872

Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor)

If charges are to be prepaid write or stamp here "To be prepaid"

Rec'd \$

To apply in prepayment of the charges on the property described hereon

Agent or Cashier

Per

(The signature here acknowledges only the amount prepaid.)

Charges advanced.

FOR THIS DELIVERY PLEASE REFERENCE SHIPMENT# TDFEYB

****ALL SCRAP MATERIAL HAS BEEN SCANNED FOR RADIOACTIVE MATERIALS****

(Commodities being transported for Remelting Purposes ONLY.
All applicable tariffs pertaining to recycling materials apply.)

PROTECT LOWEST THRU-RATE — LOADED TO FULL VISIBLE CAPACITY

* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
† The fibre boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Consolidated Freight Classification.
‡ Shipper's imprint in lieu of stamp, not a part of bill of lading approved by the Interstate Commerce Commission.

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

per

Shipper

Per

DETROIT, MI 48209

Agent

Per

LEW ROSS

Permanent post-office address of shipper

* MARK WITH "X" TO DESIGNATE HAZARDOUS MATERIAL AS DEFINED IN TITLE 49 OF FEDERAL REGULATIONS.

METAL DYNAMICS DETROIT, LLC.

STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - Not Negotiable

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading.

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SIMSMM - DETROIT NONFERROUS

SHIPMENT #

TDFOSF

CARRIER'S NO.

Ticket # TDFOSF

At DETROIT, MI Date 05/28/15 From SIMSMM - DETROIT NONFERROUS
3100 LONYO AVENUE
DETROIT, MI 48209

Consigned To RSR CORPORATION
ECO-BAT INDIANA LLC

Destination C/O QUEMETCO INC
7870 W MORRIS ST
INDIANAPOLIS, IN 46241

Route

Delivery Address

(To be filled in only when shipper desires and government tariffs provide for delivery thereat.)

Delivering

Carrier

Car Initials TK

Car No. 45

Number Packages	* HM	KIND OF PACKAGE, DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS	WEIGHT (Subject to Correction)	Class Of Rate	Ch. Col.
		WHOLE BATTERIES	GROSS 74680		
		STEEL CASED BATTERIES	TARE 32880		
		SCRAP LEAD	NET 41800		
			ADJ -1221		
			SHIP 40579		

OUR ORDER # 25874-00 MAT'L REQ # 25874-5D-00
CUST PO # 4500277593
SEAL # 10790

Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor)

If charges are to be prepaid write or stamp here: "To be prepaid"

Rec'd \$

to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per

(The signature here acknowledges only the amount prepaid.)

Charges advanced

FOR THIS DELIVERY PLEASE REFERENCE SHIPMENT# TDFOSF

****ALL SCRAP MATERIAL HAS BEEN SCANNED FOR RADIOACTIVE MATERIALS****

(Commodities being transported for Remelting Purposes ONLY.
All applicable tariffs pertaining to recycling materials apply.)

PROTECT LOWEST THRU-RATE — LOADED TO FULL VISIBLE CAPACITY

* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
† The fibre boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Consolidated Freight Classification.
‡ Shipper's imprint in lieu of stamp, not a part of bill of lading approved by the Interstate Commerce Commission.
NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding per

Shipper

Agent

DETROIT, MI 48209

Per

Per

LEW ROSS

Permanent post-office address of shipper

* MARK WITH "X" TO DESIGNATE HAZARDOUS MATERIAL AS DEFINED IN TITLE 49 OF FEDERAL REGULATIONS.

Corporate Office:
19701 S. 97th Ave
Mokena, IL 60448
(708) 479-6900
(866) 579-6900
(708) 479-6890 fax



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D 2295
4872 Cogswell Rd
Wayne, MI 48184
Special Waste Hauler #3922
US EPA # MIK187878882

Illinois Indiana Iowa Michigan Missouri Ohio Oklahoma Wisconsin

Generator/Customer	Job Site
Name: <u>SIM METAL MANAGEMENT</u>	Name:
Address: <u>3100 Lonyo</u>	Address:
City, State, Zip: <u>Detroit MI</u>	City, State, Zip:
Contact:	Phone:

Manifest # 005934526KCE

Customer PO #

Type of Recyclable Product/Waste	Quantity	Price Per Gal/Unit	Amount
Non-Hazardous Used Oil Halogen Level <1000 PPM <input type="checkbox"/>	<u>870</u>	<u>N/C</u>	<u>2</u>
Used Anti-freeze			
Non-Hazardous Waste Water			
Non-Hazardous /Sludge			
Service/Truck Charge			
Demurrage Charges			
On-Spec Used Oil Delivered			
Used Oil Filter Pick-up			
Non-Hazardous Drum Pick-up			
Parts Washer—Delivery/Service			

PAID	CHECK #	Call office with VISA MC AMER X	OFFICE TO PAY
------	---------	---------------------------------	---------------

On Site Time	Start	End
Port to Port Time	Start	End

Scope of Work Performed: _____

Driver's Name: (printed) John Truck/Trailer # 28 Date: 1/14/15

Generator Certification
I (generator) hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable national government regulations as a non hazardous/non PCB waste. I also hereby certify to pay all cost associated with disposal of any non disclosed hazardous/PCB waste found to be in this shipment. I certify that the waste minimization statement identified in 40 DFR 262.27 (a) (if I am a large quantity hazardous waste generator) or (b) (if I am a small quantity generator) is true.

[Signature]
Customer Signature

1/14/15
Date

Phone

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www.futureenvironmental.com

D 4404

4872 Cogswell Rd
Wayne, MI 48184
Special Waste Hauler #3922
US EPA # MIK187878882

AX

Illinois Indiana Iowa Michigan Missouri Ohio Oklahoma Wisconsin

Generator/Customer	Job Site
Name: <u>Sim's Metal Management</u>	Name: <u>Chris</u>
Address: <u>3100 Convo</u>	Address: <u>NEW No longer Cadbury</u>
City, State, Zip: <u>Detroit MI</u>	City, State, Zip: <u>Per Shawn</u>
Contact: <u>Chris</u>	Phone:

Manifest #

Customer PO #

Type of Recyclable Product/Waste	Quantity	Price Per Gal/Unit	Amount
Non-Hazardous Used Oil Halogen Level <1000 PPM <input type="checkbox"/>	810	75¢	\$607.50
Used Anti-freeze			
Non-Hazardous Waste Water			
Non-Hazardous /Sludge			
Service/Truck Charge			
Demurrage Charges			
On-Spec Used Oil Delivered			
Used Oil Filter Pick-up			
Non-Hazardous Drum Pick-up			
Parts Washer—Delivery/Service			

PAID <input checked="" type="checkbox"/> CHECK # <u>3811</u>	Call office with VISA MC AMEX	OFFICE TO PAY
On Site Time	Start	End
Port to Port Time	Start	End

Scope of Work Performed:

Driver's Name: (printed) J. Garcia

Truck/Trailer # 78

Date: 8/26/14

Generator Certification
I (generator) hereby declare that the contents of this container are fully and accurately described above by the proper shipping name, hazard class, proper shipping name, and are in all respects in proper condition for transport according to applicable national government regulations as a non-hazardous/non-PCB waste. I also hereby certify to pay all associated fees and disposal fees for this waste. I certify that the waste information statement identified in 40 CFR 262.22 (a) (1) (i) is a large quantity hazardous waste generator or (ii) (1) (i) is a small quantity generator.

[Signature]

Customer Signature

8/26/14

Date

Phone

TAMMY MYERS
3100 LONYO AVENUE
DETROIT, MI 48209



CERTIFICATE OF ACCEPTANCE FOR RECYCLING AND/OR DISPOSAL

ISSUED TO:

SIMS METAL MANG
3100 LONYO AVENUE DETROIT, MI 48209

By accepting the waste products described by the document number below on this certificate, Veolia ES Technical Solutions L.L.C. (Veolia ES) certifies to the generator that the transportation, storage or processing methods employed are in accordance with Veolia ES permit parameters and all applicable federal, state and local laws.

K1215937
DOCUMENT#:

09/12/2013

RECEIVED DATE:

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
1275 MINERAL SPRINGS DR.
PORT WASHINGTON, WI 53074

PROCESSING FACILITY:

WID988566543

PROCESSING FACILITY EPA ID#:

9049713P-7Q14424R

UNIQUE CONTAINER#:

691191782984032

RETURN TRACKING#:

SUPPLY-065

RECYCLEPAK PRODUCT CODE#:

Product Code	Description	QTY	UOM
LP-F04	Recycle - Four Foot Fluorescent Lamps	60.0000	LMP
LP-FUT	Recycle - U-Tube Lamps	6.00000	LMP

KEY: P=POUNDS, LFT = LINEAR FEET, LMP = LAMP, EA = EACH. Questions regarding this certificate should be directed to customer service, toll-free at 1-888-669-9725.



VEOLIA

ENVIRONMENTAL SERVICES

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
1275 MINERAL SPRINGS DRIVE
PORT WASHINGTON, WI 53074

John P. McShane

John P. McShane, Branch Manager

Sims Metal Management
MIK113238106
July 8, 2015

ATTACHMENT D: Inspection Checklist



USED OIL INSPECTION FORM – GENERATORS

BK

Facility's Name Sims Metal Management Part 8 RulesDate 7/8/2015 ID# MIK113238106 1994 PA 451

Note: Used oil is defined as "any oil which has been refined from crude oil, or any synthetic oil which has been used and as a result of use, is contaminated with physical or chemical impurities." R 299.9109

APPLICABILITY (Rule 809)

NI – Not Inspected, N/A – Not Applicable

YES NO

1. Does the facility generate used oil and any of the following materials which are subject to regulation as used oil:		<input checked="" type="checkbox"/>
a) mixture of used oil and hazardous waste generated by a CESQG regulated pursuant to Rule 205? (Rule 809(1)(a))	UOA	<input checked="" type="checkbox"/>
b) material that contains or is otherwise contaminated w/ used oil & is burned for energy recovery? (Rule 809(1)(b))	UOA	<input checked="" type="checkbox"/>
c) used oil that is drained/removed from materials that contain or contaminated w/ used oil? (Rule 809(1)(c))	UOA	<input checked="" type="checkbox"/>
d) mixture of used oil and fuel? (Rule 809(1)(d))	UOA	<input checked="" type="checkbox"/>
e) material which is produced from used oil & is burned for energy recovery? (Rule 809(1)(e))	UOA	<input checked="" type="checkbox"/>
f) used oil that is burned for energy recovery & any fuel produced from used oil by processing, blending or other treatment & exceeds the following: (Rule 809(1)(f))		
i) maximum arsenic concentration of 5ppm	UOA	<input checked="" type="checkbox"/>
ii) maximum cadmium concentration of 2ppm	UOA	<input checked="" type="checkbox"/>
iii) maximum chromium concentration of 10ppm	UOA	<input checked="" type="checkbox"/>
iv) maximum lead concentration of 100ppm	UOA	<input checked="" type="checkbox"/>
v) minimum flash point of 100 degrees Fahrenheit	UOA	<input checked="" type="checkbox"/>
vi) maximum total halogen concentration of 4,000ppm	UOA	<input checked="" type="checkbox"/>
g) recycled and a hazardous waste solely because it exhibits a hazardous characteristic? (Rule 809(1)(g))	UOA	<input checked="" type="checkbox"/>
h) used oil contains PCB's at any concentration of 50ppm or less? (May also be subject to 40 CFR Part 761) (Rule 809(2)(l))	UOA	<input checked="" type="checkbox"/>
2. Does the facility generate any of the following which exempts it from regulation as used oil: (may be subject to regulation as a hazardous waste)		
a) mixture of used oil and hazardous waste except as specified in Rule 809(1)(a)? (See question 1.a.) (Rule 809(2)(a))	UOA	<input checked="" type="checkbox"/>
b) used oil including metalworking oils/fluids containing chlorinated paraffin w/ > 1000 ppm total halogens which hasn't been successfully rebutted by demonstrating that it does not contain significant concentrations of halogenated hazardous constituents in 40 CFR Part 261, Appendix VIII? (Rule 809(2)(b))	UOA	
c) metalworking oils/fluids w/ chlorinated paraffin reclaimed through a tolling agreement? (Rule 809(2)(b)(i))	UOA	
d) used oil w/ chlorofluorocarbons from refrigeration units going for reclaim? (Rule 809(2)(b)(ii))	UOA	
e) material that contains or is otherwise contaminated w/ used oil from which the oil has been removed? (Rule 809(2)(c))	UOA	
f) mixture of used oil/diesel fuel that is mixed on used oil generator's site & used in their own vehicles? (Rule 809(2)(d))	UOA	
g) used oil & material derived from used oil that are disposed of or used in a manner constituting disposal? (Rule 809(2)(e))	UOA	
h) used oil re-refining distillation bottoms used as feed stock to manufacture asphalt products? (Rule 809(2)(f))	UOA	
i) wastewater, the discharge of which is subject to §402 or §307(b) of the CWA & is contained w/ de minimis quantities of used oil? (Rule 809(2)(g))	UOA	
j) mixture of used oil/crude or natural gas liquid for insertion into a crude oil pipeline? (Rule 809(2)(h))	UOA	
k) mixture of oil/crude or nature gas liquid w/ less than 1% used oil if being stored/transported to crude oil pipeline or petroleum refinery for insertion into process before crude distillation or catalytic cracking? (Rule 809(2)(i))	UOA	
l) used oil for insertion into petroleum refining process before crude distillation or catalytic cracking w/out prior mixing if used oil constitutes less than 1% of crude oil feed? (Rule 809(2)(j))	UOA	
m) used oil, unintentionally introduced, is captured by a hydrocarbon recovery system or wastewater treatment system at a petroleum refinery & inserted into the refining process? (Rule 809(2)(l))	UOA	
n) tank bottoms from stock tanks w/mixture of used/crude oil or nature gas liquids? (Rule 809(2)(m))	UOA	
o) used oil produced on vessels from normal shipboard operations while on-ship? (Rule 809(2)(n))	UOA	
p) specification used oil fuel once the facility demonstrates compliance w/ R 299.9815(3)(b),(c)&(f)? (Rule 809(2)(o))	UOA	
q) used oil containing polychlorinated biphenyls at 50 ppm or greater? (Rule 809(2)(p))	UOA	

GENERATOR REQUIREMENTS (Rule 810)

NOTE: Used oil generator requirements do not apply to: (1) farmers who generate, in a calendar year, an average of 25 gallons per month or less from vehicles or machinery used on the farm, or (2) household do-it-yourselfer

		YES	NO
3. Is the used oil stored in units other than containers or tanks? (Rule 810(4)) <i>Poor drainage system created</i>	UOA	<input checked="" type="checkbox"/>	NI N/A
a) in good condition? (40 CFR 279.22(b)(1)) <i>temporary impoundment</i>	UOA	<input checked="" type="checkbox"/>	NI N/A
b) not leaking (no visible leaks)? (40 CFR 279.22(b)(2))	UOA	<input checked="" type="checkbox"/>	NI N/A
4. Are all containers & above ground tanks storing used oil labeled/marked "Used Oil"? (40 CFR 279.22(c)(1))	UOA	<input type="checkbox"/>	NI N/A
5. Are fill pipes used to transfer used oil into underground tanks labeled/marked "Used Oil"? (40 CFR 279.22(c)(2))	UOA	<input type="checkbox"/>	NI N/A
6. Upon detection of a release does the facility:			
a) stop the release? (40 CFR 279.22(d)(1))	UOA	<input type="checkbox"/>	NI N/A
b) contain the released used oil? (40 CFR 279.22(d)(2))	UOA	<input type="checkbox"/>	NI N/A
c) clean-up and manage the released used oil & other material? (40 CFR 279.22(d)(3))	UOA	<input type="checkbox"/>	NI N/A
d) if necessary to prevent future release, repair/replace any leaking oil containers or tanks? (40 CFR 279.22(d)(4))	UOA	<input type="checkbox"/>	NI N/A

GENERATOR REQUIREMENTS FOR ON-SITE BURNING IN SPACE HEATER (Rule 810 refers to 40 CFR 279.23)

7. Does facility that burns used oil in oil-fired space heater(s):			
a) burn only used oil generated by the owner/operator or from household do-it-yourselfers? (40 CFR 279.23(a))	UOA	<input type="checkbox"/>	NI N/A
b) burn in heaters designed to have a maximum capacity of not more than 0.5 million BTU per hour? (40 CFR 279.23(b))	UOA	<input type="checkbox"/>	NI N/A
c) have combustion gases vented to the ambient air? (40 CFR 279.23(c))	UOA	<input type="checkbox"/>	NI N/A

GENERATOR REQUIREMENTS FOR OFF-SITE SHIPMENTS OF USED OIL (Rule 810 refers to 40 CFR 279.24)

8. Does the facility use a transporter with an EPA identification number? (Rule 810 refers to 40 CFR 279.24)	UOA	<input checked="" type="checkbox"/>	NI N/A
--	-----	-------------------------------------	--------

OR

9. If the facility does not use a transporter w/ an EPA identification number, does it meet one of the following exemptions?			
a) self transportation of small amounts to approved collection centers provided that the generator transports:			
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(a)(1))	UOA	<input type="checkbox"/>	NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(a)(2))	UOA	<input type="checkbox"/>	NI N/A
iii) to a used oil collection center that is registered, licensed, permitted or recognized by government? (40 CFR 279.24(a)(3))	UOA	<input type="checkbox"/>	NI N/A
b) self transportation of small amounts to aggregation point owned by the generator provided that the generator transports: (40 CFR 279.24(b))			
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(b)(1))	UOA	<input type="checkbox"/>	NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(b)(2))	UOA	<input type="checkbox"/>	NI N/A
iii) the used oil to a used oil aggregation point that is owned/operated by the same generator? (40 CFR 279.24(b)(3))	UOA	<input type="checkbox"/>	NI N/A
c) used oil is reclaimed and the processor returns the oil to the generator under tolling for use as lubricant, cutting oil, or coolant? (40 CFR 279.24(c))			
i) the contract indicates the type and amount of used oil and frequency? (40 CFR 279.24(c)(10))	UOA	<input type="checkbox"/>	NI N/A
ii) the contract indicates the vehicle used to transport both ways is owned by the processor? (40 CFR 279.24(c)(2))	UOA	<input type="checkbox"/>	NI N/A
iii) the contract indicates the oil will be returned to the generator? (40 CFR 279.24(c)(3))	UOA	<input type="checkbox"/>	NI N/A

USED OIL DISPOSAL (Rule 816)

10. Is used oil that cannot be recycled & is being disposed of & is not a hazardous waste managed in accordance w/ applicable federal & state regulations? (Rule 816(2))	UOA	<input type="checkbox"/>	NI N/A
11. Is the used oil used as a dust suppressant? (Rule 816(3))	UOA	<input checked="" type="checkbox"/>	NI N/A

COMMENTS:-
